

JAP:CAC

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

M-10-170

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

JEFFREY GOMEZ,  
Defendant.

(21 U.S.C. §§ 952(a)  
and 960)

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EASTERN DISTRICT OF NEW YORK, SS:

GLENN J. BUCHAN, being duly sworn, deposes and states that he is a Special Agent with United States Immigration and Customs Enforcement ("ICE"), duly appointed according to law and acting as such.

Upon information and belief, on or about February 20, 2010, within the Eastern District of New York and elsewhere, defendant JEFFREY GOMEZ did knowingly, intentionally and unlawfully import into the United States from a place outside thereof heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

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<sup>1/</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. At approximately 6:40 p.m. on February 20, 2010, defendant JEFFREY GOMEZ, a citizen of the United States, arrived at John F. Kennedy International Airport in Queens, New York, aboard Delta Airlines flight No. 167 from Accra, Ghana.

2. Defendant JEFFREY GOMEZ was selected for a routine customs examination. During the routine examination, the defendant claimed ownership of a hard sided "Express Bag" suitcase (the "Suitcase") with tag #DL105366, as well as a black knapsack. Upon examination of the Suitcase, the Customs and Border Protection ("CBP") officer noticed a false bottom.

3. Thereafter, CBP officers probed the Suitcase and a powder was found. The powder field-tested positive for heroin. Defendant JEFFREY GOMEZ was then placed under arrest.

4. The total approximate gross weight of the heroin seized from the defendant JEFFREY GOMEZ's suitcase is 2330.7 grams.

WHEREFORE, your deponent respectfully requests that defendant JEFFREY GOMEZ be dealt with according to law.



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GLENN U. BUCHAN  
Special Agent  
Immigration and Customs  
Enforcement

Sworn to before me this  
22nd day of February, 2010

THE HONORABLE CHERYL L. POLLAK  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK